

Specification 13:

Separately for each state in which Verizon and MCI both own facilities used to provide Internet backbone services, and separately for Verizon and MCI, provide in the form of lists and network maps of sufficiently precise detail a description of each company's Internet backbone facilities, including the capacity of the lit or unlit fiber, and each NAP (whether active or inactive) it controls. Identify and describe the partner(s), if any, for each NAP and their relative interests in the NAP and the relative amounts of traffic traversing the NAP.

Response to Specification 13:

Upon clarification from FCC staff, MCI is responding to the request in this specification for a description of MCI's Internet backbone facilities by providing maps that it maintains in the ordinary course of business. These maps are attached as Highly Confidential Exhibit 13 (redacted).

It is not possible separately to identify the lit and unlit capacity in MCI's Internet backbone facilities. MCI's fiber facilities are not dedicated to supporting only the Internet network. Accordingly, unlit fiber is not dedicated to any particular potential use.

As indicated in response to Specification 12, MCI owns and operates seven NAPs in the United States under the "MAE Services" name. MCI wholly owns these seven NAPs, including the switching equipment contained in them; MCI has no partners or co-owners for any of its NAPs. Significantly less than one percent of the total traffic exchanged between ISPs domestically is exchanged through MCI's MAE Services.

Specification 14:

Paragraphs 3-6 of the Cerf Declaration identifies MCI's value-added Internet services but does not provide market share information for these Internet-related services. In addition, the Public Interest Statement references "other IP services" that Verizon provides but does not describe these offerings or provide market share information. Separately for Verizon and MCI:

- a. Identify and describe each type of Internet service and Internet-related product (excluding Internet backbone services) *e.g.*, broadband Internet access services, narrowband Internet access services, voice over IP services (VoIP) provided by MCI and Verizon.

Response to Specification 14(a):

MCI provides the following types of Internet services and Internet-related products. These services are offered principally to business and wholesale customers, but, as indicated below, also in some cases to residential customers.

MCI offers a range of Internet connectivity services to business and/or wholesale customers. It offers various dedicated high-speed Internet access options, including Ethernet, cable, DSL, T1 and DS3. MCI's dedicated services include access to a router at a network hub near the customer's site, and "always-on" connectivity to MCI's network infrastructure. MCI also provides dial-up Internet access services to business and wholesale customers, enabling them to provide dial-up Internet access services to their end users in many areas by dialing a local or toll-free number. Corporate customers also buy dial-up Internet access from MCI, for small locations with low bandwidth needs.

For residential customers, MCI does not offer a retail dial-up service, but does offer Internet service over DSL connections to a small number of customers. MCI does not offer retail consumer VoIP services, although it has plans to begin a small trial of retail consumer VoIP service later this year. MCI, however, does offer its wholesale VoIP solution to cable companies and others seeking to offer VoIP services to residential customers.

MCI's Internet service offerings typically include additional features and options, such as e-mail capabilities, reporting on usage statistics, technical and other customer support, and Customer Premises Equipment and related maintenance. MCI also offers other services that add value to a customer's Internet connectivity, including web hosting, data center services, application hosting, content delivery, VoIP (for enterprise customers), contact center services, managed services, security services, and remote access services, as described in the Cerf Declaration.

- b. For each service identified in response to request 14.a, using the Merger Guidelines methodology, define the relevant geographic market, identify the competitors within that geographic market, and calculate Verizon's, MCI's, and each competitor's market shares analyzed by subscribership and revenue.

Response to Specification 14(b):

MCI incorporates by reference Verizon's response to this specification. MCI sells its Internet-based products on a national basis.

Upon clarification from FCC staff, MCI is also responding to the remaining portions of this specification by providing competitor and market share data maintained in the ordinary course of business (either prepared internally, or external reports in MCI's possession). MCI has provided relevant documents Bates numbered MCI_FCC_14_000001 *et seq.* MCI adds that its own market share in the consumer broadband market is extremely small, and, as indicated, it does not currently offer retail residential VoIP services.

- c. Separately for each service identified in response to request 14.a and separately for each geographic market identified in response to request 14.b, identify: (1) the elements of its network that MCI or Verizon, respectively, lease from an unaffiliated provider to offer each Internet or Internet-related service; (2) the percentage of the total cost of providing each Internet or Internet-related service attributable to such leased element; and (3) the unaffiliated provider of each such element.

Response to Specification 14(c):

The network elements that MCI uses to offer Internet services comprise owned and leased facilities, including Internet access circuits and facilities and Internet backbone circuits and facilities. Upon clarification by FCC staff, attached as Confidential Exhibit 14(c) (redacted) is an overview of network cost components with respect to MCI's dial-up Internet access service, DSL, high-speed dedicated Internet access (T1), and enterprise VoIP service (MCI's Advantage service).

D. Wholesale Interexchange Services

Specification 15:

According to pages 30-31 of the Public Interest Statement, there are multiple competing long-haul providers besides MCI with substantial fiber networks, including AT&T, Sprint, Qwest, Level 3, Global Crossing, and WilTel, among others.

- a. Using the Merger Guidelines methodology for defining geographic markets, explain what the proper geographic market is for long-haul service.

Response to Specification 15(a):

MCI incorporates by reference Verizon's response to this specification.

- b. For long-haul service provided to competitive LECs, interexchange carriers, and wireless providers, provide the revenues that MCI and Verizon billed and an estimate for each long-haul competitor identified in the Public Interest Statement, separately by the following geographic categories: (1) incumbent LEC franchise area and (2) the geographic market identified by the applicants in response to specification 15.a. Identify which geographic markets are within Verizon's region. Provide an explanation of how the estimate was determined, and provide supporting documentation. For purposes of this specification, revenues includes amounts received for handling foreign originated traffic if another carrier brings that traffic into the United States before handing the traffic off to the long-haul service provider.

Response to Specification 15(b):

The revenues that MCI billed for long-haul service provided to MCI's United States wholesale customers are attached as Confidential Exhibit 15(b)-(c) (redacted).

Upon clarification from FCC staff, MCI is responding to the remaining portions of this specification by providing alternative provider data maintained in the ordinary course of business (either prepared internally, or external reports in MCI's possession).

MCI has provided relevant documents Bates numbered MCI_FCC_15_000001 *et seq.*

- c. For long-haul service provided to competitive LECs, IXC's, and wireless providers, provide the number of wholesale minutes for 2004 that MCI and Verizon wholesaled and an estimate for each long-haul competitor identified in the Public Interest Statement, separately by the following geographic categories: (1) incumbent LEC franchise area and (2) the geographic market identified by the applicants in response to specification 15.a above. Identify which geographic markets are within Verizon's region. Provide an explanation of how the estimate was determined, and provide supporting documentation.

Response to Specification 15(c):

The wholesale minutes that MCI provided for long-haul service to its United States wholesale customers are attached as Confidential Exhibit 15(b)-(c) (redacted).

Upon clarification from FCC staff, MCI is responding to the remaining portions of this specification by providing alternative provider data maintained in the ordinary course of business (either prepared internally, or external reports in MCI's possession).

MCI has provided relevant documents Bates numbered MCI_FCC_15_000001 *et seq.*

- d. Identify each state where, respectively, MCI, Verizon, and each long-haul competitor identified in the Public Interest Statement owns long-haul facilities. Explain whether MCI or any long-haul competitor offers long-haul services in state(s) where it does not own long-haul facilities, and if so, how it does so.

Response to Specification 15(d):

MCI owns long-haul facilities in all states except: Alaska; Hawaii; West Virginia; Montana; and North Dakota. MCI serves Alaska via leases from AlaskCom and from GCI for switched toll voice services. MCI serves Hawaii via the backhaul ring that supports the trans-pacific cable. MCI serves West Virginia via bulk capacity leases from other carriers. MCI serves Montana and North Dakota via the bulk capacity lease from another carrier. Upon clarification from FCC staff, MCI is further responding to this specification by providing competitor information maintained in the ordinary course of business (either prepared internally, or external reports in MCI's possession). That information is being submitted to the Commission in response to its document requests at Bates numbers MCI_FCC_15_000001 *et seq.*

Specification 16:

The Public Interest Statement, at pages 56-57, states that there are multiple wholesale long haul carriers and concludes that there is a “vibrant wholesale market for long-haul capacity”.

- a. Describe the plans of MCI and Verizon with respect to offering long-haul capacity, including with respect to offering wholesale minutes, if the merger is approved.

Response to Specification 16:

MCI incorporates by reference Verizon’s response to this specification.

Specification 17:

According to page 5 of the Cerf Declaration, MCI Converged Cable Solutions wholesale product supports VoIP offerings of numerous cable operators, including long-haul transport and Class 5 switches.

- a. Separately for MCI and Verizon, describe the wholesale services and facilities provided by MCI or Verizon that enable a competitive LEC to provide local telephony to residential consumers via traditional circuit switched technology or VoIP and a list of companies that purchase VoIP support from MCI.

Response to Specification 17(a):

The Cerf Declaration states that the MCI Converged Cable Solutions product supports VoIP offerings of certain cable operators, which were identified therein: (1) Armstrong Telecommunications, Inc. and Armstrong Digital Services, Inc, collectively; (2) Bright House Network Information Services (Florida), LLC; (3) Susquehanna Cable Co.; and (4) Time Warner Cable Inc. These are the only customers to whom MCI provides this service. The technical solutions and infrastructure used to supply these services may vary for each customer over the course of its contract term, as well as from customer to customer, but the following types of services are provided to each customer: (a) transport and interconnection, allowing a customer's end users to receive and send calls to and from others via the Internet and the public switched telephone network; (b) operations support, including order management and provisioning; (c) telephony administration services, including 911, local number portability, directory services and operator assistance services; and (d) network administration services, including quality of service and network monitoring.

MCI also offers additional local telephony services on a wholesale basis that theoretically could be used to serve residential customers. For example, MCI offers a local Metropolitan Private Line service on a wholesale basis, and it is possible to use that

service to provide residential service. However, that and other local wholesale services are likely used principally to serve business customers. MCI is not aware of any MCI wholesale product other than Converged Cable Service that is in fact used to provide local service to residential customers.

- b. For each independent LEC franchise area, provide: (1) by competitive LEC, including cable operators, a description of the wholesale services and facilities MCI and Verizon provide to these carriers to enable these carriers to provide telephony services to residential customers; (2) revenues for these services; (3) an estimate of the total market for these services; and (4) the names of five alternative providers for these wholesale services and facilities. Provide an explanation of the method used to provide the estimate and identify each geographic area within Verizon's region.

Response to Specification 17(b):

The responsive wholesale services are described in the Response to Specification 17(a). MCI's revenue for the Converged Cable Solutions wholesale service described in the Response to Specification 17(a) is contained in Highly Confidential Exhibit 17(b) (redacted), which provides the information by metropolitan area rather than by LEC franchise area. Upon clarification from FCC staff, MCI is responding to subparts 17(b)(3) and (b)(4) of this specification by providing market and alternative provider data maintained in the ordinary course of business (either prepared internally, or external reports in MCI's possession). MCI has provided relevant documents Bates numbered MCI_FCC_17_000001 *et seq.*

- c. Describe the plans of MCI and Verizon with respect to the offering of MCI's Converged Cable Solutions if the merger is approved. Submit documents which describe these plans in the possession of MCI employees Claire Shields, James Myers, and Jarrett Appleby; and Verizon employees Michael Boches, David Small, Eric Bruno, and Claire Beth Nogay.

Response to Specification 17(c):

MCI incorporates by reference Verizon's response regarding the plans of MCI and Verizon with respect to the offering of MCI's Converged Cable Solutions if the

merger is approved. The requested documents are Bates numbered

MCI_FCC_17_000001 *et seq.*

- d. Submit documents which discuss competition for MCI's Converged Cable Solutions product in the possession of MCI custodians Claire Shields and James Myers.

Response to Specification 17(d):

The requested documents are Bates numbered MCI_FCC_17_000001 *et seq.*

- e. Submit any documents which discuss competition between MCI's Converged Cable Solutions product and Verizon's products in the possession of Michael Boches, David Small, Eric Bruno, and Claire Beth Nogay.

Response to Specification 17(e):

Pursuant to the instructions set forth in paragraph 20 of the Request, MCI need not respond to Specification 17(e).

E. Residential and Small Business Services

Specification 18:

According to pages 37-51 of the Public Interest Statement, the most significant competition for mass-market customers will come from facilities-based intermodal competitors that do not rely on the traditional wireline network, but instead use intermodal technologies such as cable and wireless.

- a. For each Verizon franchise area provide: (1) the number of residential resold lines; (2) the number of residential UNE-P lines; (3) the number of residential UNE-L lines; (4) an estimate of the number of competitively deployed access lines used to serve residential customers by a competitive local exchange carrier (including, but not limited to, cable telephony providers) (*i.e.*, using E-911 listings); (5) an estimate of the number of residential customers that exclusively subscribe to wireless service instead of wireline local exchange and long distance service; and (6) an estimate of the residential customers relying upon VoIP for all of their voice telecommunications needs. Of the residential customers identified in response to specification 18.a (5)-(6) identify the number of customers of MCI and Verizon. Provide an explanation of how the estimates for the responses to specification 18.a (4)-(6) were determined.

Response to Specification 18(a):

Confidential Exhibit 18(a), (b), and (d) (redacted) sets forth the information requested in specification 18(a)(1)-(3). MCI incorporates by reference Verizon's response to specification 18(a)(4)-(6), and, upon clarification from FCC staff, further provides documents Bates numbered MCI_FCC_18_000001 *et seq.*

- b. For each incumbent LEC franchise area, provide: (1) the number of residential presubscribed interstate carrier access lines regardless of whether MCI or Verizon is the residential customer's local exchange carrier; (2) the number of residential originating intrastate toll minutes and originating domestic interstate toll minutes, separately for MCI, Verizon, and an estimate for all minutes; (3) total revenues for intrastate toll and domestic interstate toll services provided to residential customers separately for MCI, and Verizon, and an estimate for all revenues; and (4) the total number of residential access lines for which MCI or Verizon is a local exchange carrier, and the number of these lines for which the presubscribed interstate long distance carrier is MCI, Verizon, AT&T, SBC, Sprint, BellSouth, Qwest, or another long distance carrier.

Response to Specification 18(b):

Confidential Exhibit 18(a), (b), and (d) (redacted) sets forth the information requested in specification 18(b).

- c. For each state in which Verizon operates as an incumbent LEC, describe the state regulation, if any, that applies to a residential local and long distance service bundle.

Response to Specification 18(c):

Pursuant to the instructions set forth in paragraph 20 of the Request, MCI need not respond to Specification 18(c).

- d. For each incumbent LEC franchise area, state separately for MCI and Verizon the number of residential customers that subscribe to a combined local and interexchange plan at a flat monthly rate, separately for plans with unlimited interexchange minutes and plans with a bucket of interexchange minutes.

Response to Specification 18(d):

Confidential Exhibit 18 (a), (b), and (d) (redacted) sets forth the number of residential customers that subscribe to an MCI combined local and interexchange plan at a flat monthly rate.

The data distinguishes among plans with unlimited interexchange minutes and plans with a bucket of interexchange minutes in the following manner. The section of Confidential Exhibit 18(a), (b), and (d) headed "Complete" identifies the number of customers subscribing to MCI's "Neighborhood Complete" product, which includes unlimited local and long distance calling. The section of the exhibit headed "BOT" (or "Block of Time") identifies the number of customers subscribing to two different MCI services: the "Neighborhood Advantage 200" plan, which includes unlimited local and 200 minutes of all-jurisdiction long distance minutes; and the "Neighborhood Connect 500" plan, available since March 1, 2005, which includes unlimited local calling and 500 minutes of all-jurisdiction long distance minutes. The section of the exhibit headed "Other" describes all other local products, including both grandfathered and actively sold products that do not have unlimited long distance or a long distance BOT component.

Specification 19:

According to page 47 of the Public Interest Statement, "MCI's participation in the mass market will consist largely of serving its dwindling legacy customer base and managing its decline as a provider of mass market services." Describe Verizon's plans with respect to residential customers that currently subscribe to MCI's services outside of Verizon's region if the merger is approved. Provide documentation to support the response.

- a. Explain how the merged entity would comply with applicable rate integration and geographic rate averaging requirements of section 254 if the merger is approved.
- b. Explain how MCI will be operated in those states within Verizon's region where section 272 obligations have not yet sunset, if the merger is approved.
- c. According to page 68 of the Public Interest Statement, Verizon has made a decision to discontinue or not expand its offering of long distance prepaid calling cards. For prepaid calls sold to residential customers, provide separately for Verizon and MCI intrastate toll and domestic interstate toll resellers of MCI or Verizon, and an estimate for all providers: (a) originating intrastate toll and domestic interstate toll minutes and (b) revenues. For purposes of this specification, revenues should represent the amounts paid by the end-user customers and should correspond to amounts reported to the IRS for federal excise tax purposes. Provide documents in the possession of MCI employees David Skogen, Patricia K. Proferes, and Melina Formisano; and Verizon employees John D. Broten and John Havens which discuss competition for prepaid calling cards, pricing strategies for prepaid calling cards, and MCI's market share of prepaid calling card minutes or revenues.

Response to Specification 19:

MCI incorporates by reference Verizon's response to subparts (a) and (b) of this specification.

In response to subpart 19(c), virtually all of MCI's prepaid card business consists of the sale of prepaid cards to other companies for retail sale to consumers. MCI receives and tracks its revenues from the sale of prepaid minutes to wholesale customers. It has no knowledge of the end-user retail revenues generated by the cards, and its data accordingly do not relate to amounts reported to the IRS for end-user services. Confidential Exhibit 19(c) (redacted) provides a breakdown by quarter over the last five quarters of wholesale revenue from MCI's prepaid card services.

Confidential Exhibit 19(c) also provides the number of minutes of the service sold by MCI, broken down by interstate and intrastate calls. MCI has no responsive

information about the number of prepaid card minutes sold by other market participants.

The requested documents are Bates numbered MCI_FCC_19_000001 *et seq.*

F. Asserted Public Interest Benefits

Specification 20:

Pages 10-18 of the Public Interest Statement and paragraphs 31-35 of the Bamberger, Carlton, and Shampine Declaration discuss the general benefits, savings, and efficiencies that will result from the merger, including, but not limited to: (1) providing a full range of communications services to enterprise customers nationwide and around the globe at an accelerated pace; (2) the reinforcement of assets that play a critical role in national defense and homeland security; (3) new products for mass market customers arising from the integration of MCI's global IP network and products and Verizon's deployment of fiber-to-the-premises; (4) enabling the combined company to provide wholesale services more efficiently; (5) cost reductions stemming from the elimination of duplicative network facilities, staff, information and operation systems, lower procurement costs, etc.; (6) increased enhancement and innovation; and (7) the development and deployment of "seamless mobility" services.

- a. Separately describe each of these asserted benefits or efficiencies, as well as any efficiencies from any and all other sources arising from the integration of MCI's and Verizon's network and operations not specifically identified above, including:
 - (1) The steps that MCI and Verizon anticipate taking to achieve the benefit or efficiency, the risks involved in achieving the benefit or efficiency, and conditions for achieving it, and the time and costs (to your company or any other person) required to achieve it;
 - (2) A quantification of the benefit or efficiency and a detailed explanation of how that quantification was calculated;
 - (3) A detailed explanation of how the proposed transaction would allow the merged company to achieve the benefit or efficiency;
 - (4) A description of why the merger is necessary to achieve this benefit or efficiency.

Response to Specification 20(a):

MCI incorporates by reference Verizon's response to this specification.

- b. For efficiencies that involve cost savings, state separately the one-time fixed costs savings (in total dollars), recurring fixed cost savings (in dollars per year), and variable cost savings (in dollars per unit, *e.g.*, minutes of use, subscribers). Explain in detail how these cost savings are aggregated up to the \$7 billion net present value cost saving estimate as discussed, *e.g.*, on page 15 of the Public Interest Statement.

Response to Specification 20(b):

MCI incorporates by reference Verizon's response to this specification.

- c. Explain whether the research and development ("R&D") (*e.g.*, investment in critical network infrastructure or advanced IP services) will be at least as large as the sum of R&D spending of the applicant firms before the merger, and whether the combined output from the combined R&D programs of the merged firm will be increased or un-reduced.

Response to Specification 20(c):

MCI incorporates by reference Verizon's response to this specification.

- d. Provide all documents and an electronic copy of all data used in calculating Verizon's \$7 billion estimate of the net present value of the savings which would be achieved through the merger, as stated on page 15 of the Public Interest Statement. Explain the extent to which the \$7 billion estimate is dependent upon the transition to a converged, IP-based broadband network as discussed, *e.g.*, on page 17 of the Public Interest Statement.

Response to Specification 20(d):

MCI incorporates by reference Verizon's response to this specification.

Specification 21:

Pages 15-18 of the Public Interest Statement discuss how the merger will increase the incentive of the merged company to “. . . bring increased investment to critical network infrastructure and accelerate the delivery of innovations to all consumers.” The Public Interest Statement claims: “The combined companies’ integrated IP network and expertise will not only enable the combined company to provide services more efficiently, but also to add new features and functions more quickly, and ultimately to deliver them faster and more efficiently to mass-market and larger business customers alike.”

- a. Quantify the benefits to residential, small business, large business, wholesale, and government customers of developing an integrated IP network, and provide a detailed explanation of how the quantifications were calculated.
- b. Describe why the merger is necessary for MCI or Verizon to achieve these benefits for residential, small business, large business, wholesale, and government customers.

Response to Specification 21:

MCI incorporates by reference Verizon’s response to this specification.

Specification 22:

Please explain how the asserted synergies resulting from the merger are likely to affect national security and homeland defense.

Response to Specification 22:

MCI incorporates by reference Verizon's response to this specification.

G. General Information

Specification 23:

Provide all documents cited in the Public Interest Statement and the Bamberger *et al.*, Crandall & Singer, Bruno & Murphy, Taylor, Lew & Lataille, Hassett *et al.*, Lataille, Smith, Buchanan, Lack & Pilgrim, Huyard, McMurtrie, Powell & Owens, Cerf, Tarazi, and Kende declarations, as well as any data or competitive analyses relied upon in preparing those documents, grouped by declaration/Public Interest Statement.

Response to Specification 23:

MCI has produced responsive documents Bates numbered MCI_FCC_23_000001 *et seq.* relating to the Huyard, McMurtrie, Powell & Owens, Cerf, Tazari, and Kende declarations.

Specification 24:

To the extent not otherwise provided in response to this Information and Document Request:

- a. Submit the following MCI documents: market studies, procurement strategies, pricing strategies, competitive strategies, product strategies, merger integration strategies, and marketing strategies (whether prepared internally or by outside advisors) relating to services sold to business, wholesale, and residential customers, as well as any competitive analyses or studies prepared expressly for MCI (whether prepared internally or by outside advisors) that discuss competition between MCI and Verizon for business, wholesale, or residential customers in the possession of Vinton Cerf, John Dziak, Philip G. Meeks, Jarrett Appleby, Nancy Gofus, Linda Mills, Thomas Ikegami, Ralph R. Montfort, Jr., Janel Crabtree, Suleiman Hessami, John Vasina, Jacquelyn A. Whiting, Pavan Bhalla, Patricia Proferes, Thomas Graham, Paul Bobeczko, Margaret Hallbach, James Myers, Michelle Fauntleroy, Melina Formisano, Ronald J. McMurtrie, Nicholas Ridolfi, David C. Gray, Blair Crump, Joseph Cook, Charles (Jack) Norris, John Krummel, John Nunziata, Craig Venable, Rick Wells, Stephen Young, and Claire Shields.

Response to Specification 24(a):

The documents responsive to this request are Bates numbered

MCI_FCC_24_000001 *et seq.*

- b. Submit the following Verizon documents: market studies, procurement strategies, pricing strategies, competitive strategies, product strategies, merger integration strategies, and marketing strategies (whether prepared internally or by outside advisors) relating to services sold to business, wholesale, and residential customers, as well as any competitive analyses or studies prepared expressly for Verizon (whether prepared internally or by outside advisors) that discuss competition between MCI and Verizon for business, wholesale, or residential customers in the possession of Michael Boches, Caroline Galand Ward, Michelle Russey McCarthy, Stephen W. Micciche, Michael Hassett, Kathy Koelle, John D. Broten, John Havens, Marilyn O'Connell, Judy Verses, John Killian, Ronald H. Lataille, Michael Daigle, Harry J. McMahon, Scott Pierce, Veronica Pellizzi, Anthony Recine, Kathleen Sullivan, Shelley Murphy, Shawne Angelle, Jeffrey E. Taylor, Eric J. Bruno, Jay A. Behrens, Kimberly G. Lessner, Joseph Lucatorto, Steven G. McCully, Claire Beth Nogay, David Small, Mark C. Griffith, Quintin Lew, Thomas D. Maguire, Jeffrey A. Masoner, Susan Fox, Mark L. Heinold, Kathryn Kalajjian, and John D. Pricken.

Response to Specification 24(b):

Pursuant to the instructions set forth in paragraph 20 of the Request, MCI need not respond to Specification 24(b).



C

Data

Bucket	SEGMENT	20004 Revenue	#of Customers	% of Total MCI Revenue
>=\$1M and <\$5M				

>=\$1M and <\$5M Total				
>=\$5M				

>=\$5M Total				
Grand Total				

Segment	Total 2004 Revenue
CA	
Globals	
Govt	
SI	
WHS�	
TOTAL USSS/WHS� Revenue	

*2004 Revenue has been restated based on the 2005 customer hierarchy

A

Msa	Msa Name	Segment	Product	Month	Customer Counts	Net Revenue
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Redacted for Public Inspection

MSA's that Include Verizon Territory

1999 MSA/PMSA Name

B

MCI Ex. 3(b)(1)

MSA

MSA NAME

Jurisdiction

Wholesale LD PIC Count from WIN
System as of May 2005

Redacted for Public Inspection

Sum of TOTAL PICS

MONTH	SEGMENT	MSA NBR	MSA NAME	DSO Equivalent Lines
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Local Line Counts March 2005

Segment revised
COMM Accounts

MSA

Total

Redacted for Public Inspection

A

Mktg Segment	Period	MSA	MSA Name	1992		OFFNET		DSO	
				# Circuits	Revenue	# Circuits	Revenue	# Circuits	Revenue
Commerical Accounts	Mar-04								

Jun-04



A

MCI 6(a)(1) – Redacted

Albany-Schenectady-Troy, NY

Albany

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

Baltimore-Towson, MD

Baltimore

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

Bridgeport-Stamford-Norwalk, CT

Stamford

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

Boston-Cambridge-Quincy

Boston

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

Buffalo-Cheektowaga-Tonawanda, NY

Buffalo

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

Dallas-Fort Worth-Arlington, TX

Dallas

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

Durham, NC

Raleigh

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

Manchester-Nashua, NH

Manchester

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

Manchester-Nashua, NH

Nashua

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

New York-Newark-Edison, NY-NJ-PA

Manhattan

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

New York-Newark-Edison, NY-NJ-PA

Long Island

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

New York-Newark-Edison, NY-NJ-PA

Newark

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

New York-Newark-Edison, NY-NJ-PA

Jersey City

REDACTED – FOR PUBLIC INSPECTION

MCI 6(a)(1) – Redacted

New York-Newark-Edison, NY-NJ-PA

White Plains

REDACTED – FOR PUBLIC INSPECTION